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VIA TELEFAX

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Mr. James C. Brown
Manager, Environmental Affairs
Department
Olin Chemicals
Post Office Box 248
Charleston, Tennessee 37310

RE: Olin Corporation/McIntosh Plant Superfund Site
Documents Revised Sampling and Analysis Plan for the
Macroinvertebrate Study proposal and Fish Sampling and Fish
Sampling Analytical Techniques proposal.

Dear Mr. Brown:

Thank you for your timely response to the Environmental Protection Agency's (EPAs) letter of October 15, 1991, regarding the fish and macroinvertebrate sampling plans. As I indicated to you in our discussion on October 22, 1991, this letter represents EPA's final position on the issues addressed in the October 15, 1991 letter. EPA has considered Olin's position as was stated in your letter of October 18, 1991. Olin's has adequately addressed each of EPA's concerns with the exception of the following.

1. EPA will review the final results for the investigation of operable unit one (OU-1) and determine based on those results if further investigation of the Bis(2-Ethylhexyl)phthalate is required.
2. The "fillet plus remains" method may not be used to approximate whole body concentrations. Actual whole body concentrations will be obtained (50% per species for ecological and 50% for human health concerns). This will provide a balance between human health and ecological concerns. The increase from 5 to 10 fish in the sample population for ecological concerns will compensate for the limited selection of analytical parameters and species, and contributes to obtaining a sufficiently representative sample. A sample size of 10 fish or 50% will provide an adequate measure of human health impacts.

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3. The revision to the fish sampling procedure of section 5.2 of the Revised Sampling and Analysis Plan is outlined below and must be incorporated into the forthcoming final plans.
 - a. A minimum of 22 individual fish of each species will be collected.
 - b. Both fillets, from 50% of the fish collected, (eleven of each species) will be prepared for analysis.
 - c. Eleven fish will be prepared for whole body analysis.
 - d. Section 5.2.6 will be revised to indicate that one prepared fillet and one whole body sample will be prepared and provided for EPA's oversight contractor.

EPA is prepared to perform oversight for the fish sampling and the macroinvertebrate study beginning on November 4, 1991. If you have any questions you may contact me at (404) 347-2643.

Sincerely,

Kenneth A. Lucas
Remedial Project Manager
South Superfund Remedial Branch

cc: Toni Odom, Olin
Joe Downey, ADEM
Dan Cooper, ADEM
Joanne Benante, RCRA
Joan Dupont, GRWT
Julie Keller, Waste/HRA
Bill Bokey, ESD
Joyce Catrett, ORC
Lynn Wellman, Waste/ETAG
Rachel Cochran, PRC